

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

WEITHORN/CASPER ASSOCIATES FOR
SELECTED HOLDINGS, LLC,
STANLEY S. WEITHORN REVOCABLE TRUST,

ARTICLE SIXTH TRUST,

HOWARD B. WEITHORN TRUST,

WEITHORN GRANDCHILDREN CHARITABLE
LEAD UNITRUST,

WEITHORN FAMILY CHARITABLE LEAD

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04511 (SMB)

ANNUITY TRUST,

LARA L. WEITHORN TRUST,

WEITHORN FAMILY CHARITABLE
REMAINDER UNITRUST,

MLM CHARITABLE REMAINDER UNITRUST,

WEITHORN AND EHRMANN FAMILIES
FOUNDATION,

STANLEY/LOIS CHARITABLE REMAINDER
UNITRUST,

STANLEY S. WEITHORN, individually, in his capacity as General Manager/Partner of Weithorn/Casper Associates for Selected Holdings, LLC, as trustee of the Article Sixth Trust, Stanley S. Weithorn Revocable Trust, Howard B. Weithorn Trust, Lara L. Weithorn Trust, Weithorn Family Charitable Remainder Unitrust, MLM Charitable Remainder Unitrust, Stanley/Lois Charitable Remainder Unitrust, and director of Weithorn and Ehrmann Families Foundation,

MICHAEL J. WEITHORN, in his capacity as co-trustee of the Weithorn Grandchildren Charitable Lead Unitrust, and the Weithorn Family Charitable Lead Annuity Trust,

WILLIAM J. ROUHANA, JR., in his capacity as co-trustee of the Weithorn Grandchildren Charitable Lead Unitrust and the Weithorn Family Charitable Lead Annuity Trust,

MURIEL CASPER WEITHORN,

COREY CASPER,

HOWARD B. WEITHORN, and

MONROE KLEIN,

Defendants.

STIPULATION EXTENDING TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Weithorn/Casper Associates for Selected Holdings, LLC, Stanley S. Weithorn Revocable Trust, Article Sixth Trust, Howard B. Weithorn Trust, Weithorn Grandchildren Charitable Lead Trust, Weithorn Family Charitable Lead Annuity Trust, Lara L. Weithorn Trust, Weithorn Family Charitable Remainder Trust, MLM Charitable Remainder Unitrust, Weithorn and Ehrmann Families Foundation, Stanley/Lois Charitable Remainder Unitrust, Stanley S. Weithorn, Michael J. Weithorn, William J. Rouhana, Muriel Casper Weithorn, Corey Casper, Howard B. Weithorn, and Monroe Klein (collectively, "Defendants") may move, answer or otherwise respond to the complaint (the "Complaint") filed in the above-captioned adversary proceeding (Adv. Pro. No. 10-04511) is extended up to and including March 8, 2016.

The purpose of this stipulated extension (the "Stipulation") is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of the Defendants' right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

Undersigned counsel for the Defendants: (i) expressly represents that as of the date of this stipulation, all of the Defendants represented by the undersigned counsel in the adversary proceeding are alive, or that counsel has previously provided notice to the Trustee in writing of any Defendant's death; (ii) expressly agrees to notify the Trustee in writing of the death of the Defendant within thirty (30) days of the date of such Defendant's death, and to provide to the

Trustee the county and state of residence at the time of death of the deceased Defendant; and (iii) expressly agrees to reasonably cooperate with the Trustee, where applicable, by, among other things, (a) advising the Trustee whether a probate has or will be filed, (b) filing a stipulation substituting the deceased Defendant's estate or personal representative/executor and/or (c) advising the Trustee who will represent the deceased Defendant's estate herein and in any probate proceeding. For the avoidance of doubt, the parties to this stipulation expressly agree that the obligations set forth in this paragraph shall continue beyond the time period addressed by the stipulation and shall be ongoing for the duration of the above-captioned adversary proceeding.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (ECF No. 12312) in the above-captioned case (No. 08-01789 (SMB)).

[Signature Page To Follow]

Dated: February 24, 2016

BAKER HOSTETLER LLP

By: s/ Dominic A. Gentile
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Keith R. Murphy
Email: kmurphy@bakerlaw.com
Dominic A. Gentile
Email: dgentile@bakerlaw.com

*Attorneys for plaintiff Irving H. Picard,
Trustee for the Substantively Consolidated
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Estate of Bernard L.
Madoff*

**BECKER, GLYNN, MUFFLY, CHASSIN
& HOSINSKI, LLP**

By: s/ Chester B. Salomon
299 Park Avenue – 16th floor
New York, New York 10171
Telephone: 212.888.3033
Facsimile: 212.888.0255
Chester B. Salomon
Email: csalomon@beckerglynn.com

*Attorneys for defendants Weithorn/Casper
Associates for Selected Holdings, LLC,
Stanley S. Weithorn Revocable Trust, Article
Sixth Trust, Howard B. Weithorn Trust,
Weithorn Grandchildren Charitable Lead
Trust, Weithorn Family Charitable Lead
Annuity Trust, Lara L. Weithorn Trust,
Weithorn Family Charitable Remainder
Trust, MLM Charitable Remainder Unitrust,
Weithorn and Ehrmann Families
Foundation, Stanley/Lois Charitable
Remainder Unitrust, Stanley S. Weithorn,
Michael J. Weithorn, William J. Rouhana,
Muriel Casper Weithorn, Corey Casper,
Howard B. Weithorn, and Monroe Klein*